

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address  Peter J. Mastan, Trustee 550 S. Hope St., Suite 1765 Los Angeles, CA 90071 (213) 452-4928 travis.terry@dinsmore.com  <input checked="" type="checkbox"/> Individual appearing without attorney <input type="checkbox"/> Attorney for:	FOR COURT USE ONLY
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UNITED STATES BANKRUPTCY COURT  
CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION

In re:  BLANCA OLIVIA CORRALES,   Debtor(s).	CASE NO.: 2:19-bk-25003-ER CHAPTER: 7  <b>NOTICE OF SALE OF ESTATE PROPERTY</b>
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<b>Sale Date:</b> 04/15/2020	<b>Time:</b> 10:00 am
<b>Location:</b>	

**Type of Sale:** ☒ Public ☐ Private **Last date to file objections:** 04/01/2020

**Description of property to be sold:** \_\_\_\_\_  
2006 Dodge Ram  
\_\_\_\_\_  
\_\_\_\_\_

**Terms and conditions of sale:** "AS IS" and "WHERE IS" basis, subject to all existing encumbrances, liens, claims and restrictions thereon, if any.  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Proposed sale price:** \$ 5,850.00 \_\_\_\_\_

This form is mandatory. It has been approved for use in the United States Bankruptcy Court for the Central District of California.

**Overbid procedure (if any):** Initial bid must be at least \$6,825 (the amount being paid or waived by Debtor plus \$1,000). Subsequent bids must be at least \$500 higher than the initial bid.

**If property is to be sold free and clear of liens or other interests, list date, time and location of hearing:**

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**Contact person for potential bidders (include name, address, telephone, fax and/or email address):**

Peter J. Mastan, Trustee  
550 S. Hope St., Suite 1765  
Los Angeles, CA 90071  
(213) 335-7739  
travis.terry@dinsmore.com

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Date: 03/17/2020

1 Peter J. Mastan, Trustee  
2 *travis.terry@dinsmore.com*  
3 550 Hope St., Suite 1765  
4 Los Angeles, CA 90071  
5 Telephone: 213-335-7737

6 Chapter 7 Trustee of the Bankruptcy Estate  
7 of Blanca Olivia Corrales

8 **UNITED STATES BANKRUPTCY COURT**  
9 **CENTRAL DISTRICT OF CALIFORNIA**  
10 **LOS ANGELES DIVISION**

11 In re:

12  
13 **BLANCA OLIVIA CORRALES,**

14  
15 Debtor(s).

Case No. 2:19-bk-25003-ER

Chapter 7

**NOTICE OF HEARING ON MOTION  
TO APPROVE ASSIGNMENT  
AGREEMENT BETWEEN THE  
TRUSTEE AND DEBTOR FOR THE  
TRUSTEE'S CONVEYANCE OF THE  
ESTATE'S INTEREST IN 2006  
DODGE RAM**

**Date: April 15, 2020  
Time: 10:00 a.m.  
Ctrm: Courtroom 1575  
255 E. Temple Street  
Los Angeles, CA 90012  
Judge: Hon. Ernest M. Robles**

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**1 TO THE DEBTOR, THE OFFICE OF THE UNITED STATES TRUSTEE, ALL**  
**2 POTENTIAL CREDITORS OF THE ESTATE, ALL OTHER INTERESTED PARTIES;**  
**3 AND THEIR RESPECTIVE COUNSEL OF RECORD, IF ANY:**

**4 NOTICE IS HEREBY GIVEN** that, on April 15, 2020, on the 10:00 a.m. calendar, in  
**5 Courtroom 1568 of the United States Bankruptcy Court located at 255 E. Temple Street, Los**  
**6 Angeles, California 90012, the Honorable Ernest M. Robles, United States Bankruptcy Judge, will**  
**7 conduct a hearing on the "Motion to Approve Assignment Agreement Between The Trustee and**  
**8 Debtor for The Trustee's Conveyance of the Estate's Interest in 2006 Dodge Ram" (the "Motion")**  
**9 filed by Peter J. Mastan, Chapter 7 trustee (the "Trustee") of the bankruptcy estate of Blanca**  
**10 Olivia Corrales (the "Debtor"). Through the Motion, the Trustee seeks an order that does each of**  
**11 the following:**

**12 (1) Approves the Assignment Agreement (the "Agreement") attached as Exhibit 1 to**  
**13 the Motion.**

**14 (2) Authorizes the Trustee to make the assignment of the Estate's interest in the vehicle**  
**15 described as 2006 Dodge Ram (VIN 1D7HA16226J218805) (the "Vehicle") and determines that**  
**16 the assignment is made on an "AS IS" and "WHERE IS" basis, subject to all existing**  
**17 encumbrances, liens, claims and restrictions thereon, if any.**

**18 (3) Determines that the Agreement was made in good faith in an arm's-length**  
**19 transaction and that the assignee of the Estate's interest in the Vehicle (whether the Debtor, or a**  
**20 successful overbidder) is acting in good faith within the meaning of 11 U.S.C. § 363(m).**

**21 (4) Determines that adequate notice of the Motion was given.**

**22 (5) Authorizes the Trustee to perform the terms of the Agreement and to sign all such**  
**23 documents that are reasonably necessary to perform the Trustee's obligations under the**  
**24 Agreement.**

**25 (6) Reserves Bankruptcy Court jurisdiction to enforce the Agreement.**

**26 (7) Approves the following overbid procedure:**

**27 ///**

**28 ///**

1           (a) any initial overbid for an assignment of the Estate's interest in the Vehicle  
2 must be in an amount at least \$1,000 greater than the amount to be paid by Debtor under the  
3 Agreement (i.e., in an amount not less than \$3,500, plus the amount of Debtor's claimed  
4 exemption of \$3,325 in the Vehicle for a total of \$6,825);

5           (b) in the event that the Trustee receives multiple overbids, any subsequent  
6 overbids must be made in Court at the time of the hearing on the Motion and must be made in  
7 minimum increments of \$500;

8           (c) any overbid must be accompanied by a certified or cashier's check in the  
9 full amount of that bid and the successful overbidder must pay to the Trustee by certified or  
10 cashier's check the full purchase price at the time of the hearing on the Motion;

11           (d) any sale at overbid will be all cash "AS IS", "WHERE IS", subject to all  
12 claims, liens, encumbrances, and other interests, with all faults and without any representation or  
13 warranty whatsoever, whether express or implied, including without limitation, without warranty  
14 as to functionality, merchantability, or fitness for a particular purpose and;

15           (e) the Trustee may exercise his discretion to reject a particular overbid that is  
16 not both higher and better (based upon all of the circumstances) than the Debtor's offer or the  
17 offer of other overbidders.

18           (f) any person making an overbid for the Vehicle shall be deemed to have  
19 made, on his/her/its own account, each of the representations made by the Debtor to the Trustee as  
20 set forth in Paragraph 5 of the Agreement.

21           (8) Authorizes the Trustee to close the proposed assignment of the Estate's interest in  
22 the Vehicle to the Debtor (or the successful overbidder) unless an appeal of the order authorizing  
23 that sale is timely filed and a stay pending appeal is entered.

24           (9) Waives the 14-day stay of orders for the disposition of Estate property set forth in  
25 Fed.R.Bankr.P. 6004(h).

26           **NOTICE IS FURTHER GIVEN** that the Motion is made pursuant to 11 U.S.C.  
27 §§ 363(b) and 363(m), Federal Rules of Bankruptcy Procedure 2002 and 6004, and Local  
28 Bankruptcy Rules 6004-1 and 9013-1 on the grounds that the proposed assignment is in the best

1 interest of the Estate in that it will maximize the value of the Vehicle to unsecured creditors of the  
2 Estate.

3 **NOTICE IS FURTHER GIVEN** that the Motion is based on (a) this Notice of Hearing;  
4 (b) the concurrently filed Notice of Motion and Motion, Memorandum of Points and Authorities,  
5 Declaration of Peter J. Mastan, and Exhibits; (c) the pleadings on file with the Court of which the  
6 Court is requested to take judicial notice; and (d) such further evidence that may be properly  
7 submitted prior to or at any hearing on the Motion. At your own expense, you may obtain a  
8 complete copy of the Motion, including Memorandum of Points and Authorities, declarations, and  
9 exhibits, from the Court's file. Alternatively, you may obtain a complete, electronic copy of the  
10 Motion by providing your email address to Travis Terry (email: [travis.terry@dinsmore.com](mailto:travis.terry@dinsmore.com);  
11 tel. (213) 335-7739.

12 **NOTICE IS FURTHER GIVEN** that, pursuant to Local Bankruptcy Rule 9013-1(f), any  
13 opposition to the Motion must be in writing; must be filed with the Court and served upon the  
14 Trustee, the Office of the United States Trustee, and the Debtor at the addresses set forth below  
15 not later than 14 days before the hearing on the Motion; and must include a complete written  
16 statement of all reasons in opposition thereto or in support or joinder thereof, declarations and  
17 copies of all photographs and documentary evidence on which the responding party intends to  
18 rely, and any responding memorandum of points and authorities:

19 **For Filing With the Court**

20 Clerk's Office  
21 United States Bankruptcy Court  
22 255 E. Temple Street, Room 940  
23 Los Angeles, California 90012

24 **For Service on Ernest M. Robles, Bankruptcy Judge**

25 Hon. Ernest M. Robles  
26 United States Bankruptcy Court  
27 Central District of California  
28 Edward R. Roybal Federal  
Building and Courthouse  
255 E. Temple Street, Suite 1582  
Los Angeles, CA 90012

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**For Service on the Trustee**

Peter J. Mastan, Trustee  
550 South Hope Street, Suite 1765  
Los Angeles, California 90071-2627

**For Service on Office of U.S. Trustee**

Office of the U.S. Trustee  
915 Wilshire Blvd., Suite 1850  
Los Angeles, CA 90017

**For Service on the Debtor**

Jaime A. Cuevas, Jr.  
1712 W Beverly Blvd Ste 202  
Montebello, CA 90640-3900

and


Blanca Olivia Corrales  
7911 Clarkson Ave  
Cudahy, CA 90201-6915

**NOTICE IS FURTHER GIVEN** that, pursuant to Local Bankruptcy Rule 9013-1(h),  
failure to timely file and serve an objection may be deemed by the Court to be consent to granting  
the Motion.

DATED: March 17, 2020

Respectfully submitted,

CHAPTER 7 TRUSTEE

By:   
Peter J. Mastan  
Chapter 7 Trustee of the Bankruptcy  
Estate of Blanca Olivia Corrales



**PROOF OF SERVICE OF DOCUMENT**

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 550 S. Hope Street, Suite 1765, Los Angeles, CA 90071

A true and correct copy of the foregoing document described as: **NOTICE OF SALE OF ESTATE PROPERTY** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d), and (b) in the manner indicated below:

**I. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING ("NEF")** - Pursuant to controlling General Order(S) and Local Bankruptcy Rule(s) ("LBR"), the foregoing document will be served by the court via NEF and hyperlink to the document. On **March 17, 2020**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following person(s) are on the Electronic Mail Notice List to receive NEF transmission at the email addresses indicated below:

- **Jaime A Cuevas** jcuevasbklaw@gmail.com, cuevasjr78473@notify.bestcase.com
- **Peter J Mastan (TR)** peter.mastan@dinsmore.com, pmastan@iq7technology.com;travis.terry@dinsmore.com
- **United States Trustee (LA)** ustpreion16.la.ecf@usdoj.gov

\_\_\_\_ Service information continued on attached page

**II. SERVED BY U.S. MAIL OR OVERNIGHT MAIL** (indicate method for each person or entity served): On **March 17, 2020** I served the following person(s) and/or entity(ies) at the last known address(es) in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States Mail, first class, postage prepaid, and/or with an overnight mail service addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

**UNITED STATES BANKRUPTCY COURT**

Hon. Ernest M. Robles  
United States Bankruptcy Court  
Edward R. Roybal Federal  
Building and Courthouse  
255 E. Temple Street, Suite 1560  
Los Angeles, CA 90012

**DEBTOR(S)**

Blanca Olivia Corrales  
7911 Clarkson Ave  
Cudahy, CA 90201-6915

\_\_\_\_ Service information continued on attached page

**III. SERVED BY PERSONAL DELIVERY, FACSIMILE TRANSMISSION OR EMAIL** (indicate method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on **March 17, 2020** I served the following person(s) and/or entity(ies) by personal delivery, or (for those who consented in writing to such service method) by facsimile transmission and/or email as follows:. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

\_\_\_\_ Service information continued on attached page


I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

**March 17, 2020**

Date

**TRAVIS MICHAEL TERRY**

Type name

  
Signature